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Attorneys for Defendant,
CAPITAL ONE BANK (USA), N.A.,
erroneously sued as "Capital One"

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA – LAS VEGAS

BRIAN A. WALSH,
Plaintiff,

v.

BANK OF AMERICA, N.A., CAPITAL
ONE, COMPASS BANK, MORTGAGE
SERVICE CENTER, SPECIALIZED
LOAN SERVICING, LLC,
ROUNDPOINT MORTGAGE, and
EXPERIAN INFORMATION
SOLUTIONS, INC.,

Defendants.

Case No. 2:15-cv-02350-APG-PAL

*Assigned to Judge Andrew P.
Gordon
Referred to Magistrate Judge Peggy
A. Leen*

**STIPULATION TO EXTEND
TIME TO RESPOND TO
COMPLAINT**

(FIRST REQUEST)

*[[Proposed] Order lodged
concurrently herewith]*

Complaint Filed: August 6, 2015
Trial Date: TBA

1 Plaintiff Brian A. Walsh ("Plaintiff"), by and through his counsel of record,
2 Michael Kind (who appeared in the state-court action before it was removed to this
3 Court and will make an appearance in this Court shortly) and Defendant Capital One
4 Bank (USA), N.A., erroneously named as "Capital One" ("Capital One"), by and
5 through its counsel of record, Brandon C. Fernald, hereby submit this stipulation to
6 extend Capital One's time to file a responsive pleading to Plaintiff's Complaint by
7 thirty (30) days, as follows:

8 **WHEREAS:**

9 1. Plaintiff filed the Complaint in this matter on August 6, 2015, and
10 effectuated service of his Summons and Complaint on Capital One on November 19,
11 2015;

12 2. The Parties agree that a brief extension of time for Capital One to file its
13 responsive pleading to the Complaint would benefit both Parties because it will allow
14 them to gather additional facts and information while continuing to devote their
15 resources to exploring the potential for early resolution of this matter before incurring
16 further fees and costs;

17 3. Capital One and Plaintiff have agreed to extend Capital One's current
18 deadline to respond to Plaintiff's Complaint by thirty (30) days to January 15, 2016;

19
20 **NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:**

21 CAPITAL ONE will file its responsive pleading to Plaintiff's Complaint on or
22 before January 15, 2016.

23
24 **IT IS SO STIPULATED.**
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1 DATED: December 16, 2015

KAZEROUNI LAW GROUP, APC

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3 By: /s/ Michael Kind

4 MICHAEL KIND
Attorneys for Plaintiff,
5 TOMMY D. DAVIS

6 DATED: December 16, 2015

FERNALD LAW GROUP LLP

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8 By: /s/ Brandon C. Fernald

9 BRANDON C. FERNALD
Attorneys for Defendant,
10 CAPITAL ONE BANK (USA),
N.A., Erroneously Named As
11 "Capital One"

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA – LAS VEGAS**
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11 BRIAN A. WALSH,
12 Plaintiff,

13 v.

14 BANK OF AMERICA, N.A., CAPITAL
15 ONE, COMPASS BANK, MORTGAGE
16 SERVICE CENTER, SPECIALIZED
17 LOAN SERVICING, LLC,
18 ROUNDPOINT MORTGAGE, and
19 EXPERIAN INFORMATION
20 SOLUTIONS, INC.,

21 Defendants.
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Case No. 2:15-cv-02350-APG-PAL

*Assigned to Judge Andrew P.
Gordon*

*Referred to Magistrate Judge Peggy
A. Leen*

**[PROPOSED] ORDER
EXTENDING TIME TO
RESPOND TO COMPLAINT**

*[Stipulation filed concurrently
herewith]*

Complaint Filed: August 6, 2015
Trial Date: TBA

ORDER

The Court has reviewed the Stipulation filed by Plaintiff Brian A. Walsh and Defendant Capital One Bank (USA), N.A. ("Capital One"), to extend Capital One's time to file a responsive pleading by thirty (30) days. The Stipulation is incorporated herein by reference. Good cause appearing thereon, the Court hereby orders as follows:

Capital One's time to file a responsive pleading to the Complaint is hereby extended. Capital One shall file its responsive pleading to the Complaint on or before January 15, 2016.

IT IS SO ORDERED.

DATED: December 21, 2015



HON. PEGGY A. LEEN
UNITED STATES MAGISTRATE JUDGE